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October 21, 2024

By ECF

Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn NY 11201

Re: *United States v. Zhu*, 21 Cr. 265 (PKC)

Your Honor:

I represent Zhu Yong (aka Yong Zhu) in the above-captioned case. I write with the government's consent respectfully to request that Mr. Zhu's sentencing, presently scheduled for November 19, 2024, be adjourned to a date at the Court's convenience in mid to late January. I received the PSR approximately one week ago and promptly forwarded it to a translator. It is going to take several more weeks to get the PSR translated to review with Mr. Zhu. I anticipate that there may be meaningful Guidelines and other disputes at sentencing, and I would like the time to review the PSR carefully with Mr. Zhu and to narrow disputes as much as possible. This is the first request to continue the sentencing.

I conferred with AUSA Meredith Arfa, who consents to this request. The government asked me to inform the Court that the government is not available on January 1, 2, 3, 28, 30, or 31. The defense is not available the morning of January 10. We otherwise request a date in mid- to late January at the Court's convenience. Thank you for your consideration.

Respectfully submitted,

/s/ Benjamin Silverman
Benjamin Silverman
Attorney for Zhu Yong (aka Yong Zhu)

cc: Counsel of record (by ECF)